

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES OF AMERICA,)
Appellee)

v.)

Docket No: 15-4329

DARIUS DONNELL FREEMAN,)
Appellant)

SECOND MOTION FOR EXTENSION OF TIME TO FILE BRIEF

NOW COMES Appellant Darius Donnell Freeman, through counsel, and moves the Court for an additional extension of time to file his brief so that it may be filed on October 30, 2015. In support of this motion, the Appellant shows the Court:

1. Appellant's brief is currently due by September 30, 2015.
2. Preparation of the brief has been hindered by court commitments and an extensive caseload.
3. Counsel for Mr. Freeman has consulted with Attorney Brian Aus, counsel for Wincy Joseph, the appellant in the case consolidated with the above-captioned matter (docket no. 15-4330), and he consents to a continuance and joins in this motion. Mr. Aus informs the

undersigned that he also needs additional time to file the brief due to a jury trial that is scheduled during the week of September 28, 2015.

4. Counsel for the appellants also need additional time to coordinate with one another with regard to preparation of the brief.
5. Opposing counsel does not oppose an extension of time to file the brief.

WHEREFORE, the Appellant moves this Honorable Court for a 30-day extension of time to file his brief so that it may be filed on October 30, 2015.

This the 28th day of September, 2015.

Respectfully submitted,

/s/ C. Melissa Owen

C. Melissa Owen

TIN FULTON WALKER & OWEN, PLLC

Bar No. 28903

301 East Park Ave.

Charlotte, N.C. 28203

Phone: 704-338-1220

Fax: 704-338-1312

Email: cmowen@tinfulton.com

CERTIFICATE OF SERVICE

I certify that I have served the foregoing **SECOND MOTION FOR EXTENSION OF TIME TO FILE BRIEF** on opposing counsel by filing through ECF, to be sent to:

Amy Ray
U.S. Attorney's Office
Amy.ray@usdoj.gov

Brian Aus
Attorney for Mr. Joseph
brianauslaw@gmail.com

This the 28th day of September, 2015.

/s/ C. Melissa Owen
C. Melissa Owen
TIN FULTON WALKER & OWEN, PLLC
Bar No. 28903
301 East Park Ave.
Charlotte, N.C. 28203
Phone: 704-338-1220
Fax: 704-338-1312
Email: cmowen@tinfulton.com